

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Plaintiff,

v.

BRYANSTON GROUP INC. et al.,

Defendants.

Case No.: 1:08-cv-04806 (LAP)

**MOTION TO ADMIT JAMES A.  
BRUTON, III PRO HAC VICE**

X

Pursuant to Local Civil Rule 1.3(c), undersigned counsel respectfully moves for the admission *pro hac vice* of the following attorney in the above-captioned matter:

**James A. Bruton, III**  
Williams & Connolly LLP  
725 Twelfth Street, N.W.  
Washington, DC 20005  
Tel: (202) 434-5000  
Fax: (202) 434-5029

Mr. Bruton is a member in good standing of the Bar of the District of Columbia and the Bar of the Commonwealth of Pennsylvania. There are no pending disciplinary proceedings against Mr. Bruton in any State or Federal Court. This Motion is based on the accompanying Affidavit of Stuart E. Abrams and Certificates of Good Standing from the District of Columbia Bar and the Pennsylvania Bar. A proposed Order is attached hereto.

JUL 29 2008

DC 825-658469

Dated: July 25, 2008

FRANKEL & ABRAMS

By: 

Stuart E. Abrams

Frankel & Abrams

230 Park Avenue, Suite 660

New York, New York 10169-0005

(212)661-5000

*Counsel for Claimant Beatrice Tollman*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Plaintiff,

v.

BRYANSTON GROUP INC. et al.,

Defendants.

Case No.: 1:08-cv-04806 (LAP)

**DECLARATION OF STUART E.  
ABRAMS IN SUPPORT OF  
MOTION TO ADMIT JAMES A.  
BRUTON, III PRO HAC VICE**

X

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I, STUART E. ABRAMS, ESQ., an attorney duly admitted to practice law before the Courts of the State of New York, hereby declare the following to be true under the penalties of perjury, pursuant to 28 U.S.C. § 1746:

1. I am a partner at Frankel & Abrams and counsel for Claimant Beatrice Tollman in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth here and in support of the motion to admit James A. Bruton, III as counsel pro hac vice to represent Ms. Tollman in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice in 1978. I am also a member in good standing of the bar of this Court, admitted in 1978.
3. I have known Mr. Bruton since 1987.
4. Mr. Bruton is a partner at Williams & Connolly, in Washington, DC.

5. I have found Mr. Bruton to be a skilled attorney and person of the highest integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Mr. Bruton is a member in good standing of the bar of the District of Columbia and the bar of the Commonwealth of Pennsylvania. In connection with this motion, I am submitting Certificates of Good Standing issued by these bars. I am aware of no pending disciplinary proceedings against Mr. Bruton in any state or federal court.

7. For the foregoing reasons, I respectfully move the *pro hac vice* admission of James A. Bruton, III in the above-captioned matter. For the Court's convenience, a proposed order granting this motion is attached hereto.

Dated: July 25, 2008

FRANKEL & ABRAMS

By: 

Stuart E. Abrams

Frankel & Abrams

230 Park Avenue, Suite 660

New York, New York 10169-0005

(212)661-5000

*Counsel for Claimant Beatrice Tollman*



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

JAMES A. BRUTON, III

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was on the 16<sup>TH</sup> day of MARCH, 1982

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on July 23, 2008.

GARLAND PINKSTON, JR., CLERK

By: M. Charles  
Deputy Clerk



Supreme Court of Pennsylvania

**CERTIFICATE OF GOOD STANDING**

***James A. Bruton, III, Esq.***

**DATE OF ADMISSION**

***October 31, 1975***

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: July 16, 2008

A handwritten signature in black ink, reading "Patricia A. Johnson".

Patricia A. Johnson  
Chief Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

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Defendants.

Case No.: 1:08-cv-04806 (LAP)

**[PROPOSED] ORDER FOR  
ADMISSION OF JAMES A.  
BRUTON, III PRO HAC VICE**

X

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This matter having been brought before the Court by motion pursuant to Local Civil Rule 1.3(c) for the admission *pro hac vice* of James A. Bruton, III, Esq., in the above-captioned matter, it is this \_\_\_ day of \_\_\_\_\_ 2008, hereby

ORDERED that the motion is GRANTED, and

IT IS FURTHER ORDERED THAT James A. Bruton, III shall be admitted *pro hac vice* in the above-captioned matter. Counsel shall remit the required \$25 fee to the Cashier's Office for this *pro hac vice* admission.

Dated:

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HON. LORETTA A. PRESKA, U.S.D.J.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,  
Plaintiff,

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BRYANSTON GROUP INC., et al.,  
Defendants.

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**CERTIFICATE OF SERVICE**

STUART E. ABRAMS, hereby certifies that on July 28, 2008, I caused to be served by First Class Mail a true and correct copy of the attached Motion for Admission Pro Hac Vice and supporting papers upon

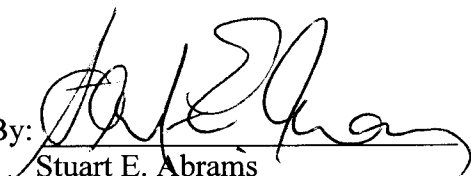
Barbara Ann Ward  
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K. Chris Todd, Esq.  
Kellogg, Huber, Hansen, Todd,  
Evans & Figel, P.L.L.C.  
1615 M St. NW, Suite 400  
Washington, D.C. 20036

Dated: July 28, 2008

By:   
Stuart E. Abrams  
Counsel for Stanley Tollman